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**From:** Minter, Douglas [Minter.Douglas@epa.gov]  
**Sent:** 10/26/2020 11:40:12 PM  
**To:** Bahrman, Sarah [Bahrman.Sarah@epa.gov]; Robinson, Valois [Robinson.Valois@epa.gov]; Chin, Lucita [Chin.Lucita@epa.gov]  
**Subject:** RE: Update/Timing on DB Final Permit Effort

Yes, I moved the comments/responses to start with #374.

Thanks!

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**From:** Bahrman, Sarah <Bahrman.Sarah@epa.gov>  
**Sent:** Monday, October 26, 2020 5:12 PM  
**To:** Minter, Douglas <Minter.Douglas@epa.gov>; Robinson, Valois <Robinson.Valois@epa.gov>; Chin, Lucita <Chin.Lucita@epa.gov>  
**Subject:** RE: Update/Timing on DB Final Permit Effort

Hi Douglas –  
This is consistent with my notes from our meeting today.

One question – the ESA insert into the RTC has a different format for numbering and needs to be revised. Can we move this section to follow the CEA section (and just before the outside scope comments), and then pick up the comment numbering from there (starting with comment number 374 in the current version) so we don't have to change the numbering in the whole CEA section?

Thanks,  
Sarah

Sarah E. Bahrman | Chief, Safe Drinking Water Branch | U.S. Environmental Protection Agency - Region 8  
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**From:** Minter, Douglas <Minter.Douglas@epa.gov>  
**Sent:** Monday, October 26, 2020 5:02 PM  
**To:** Bahrman, Sarah <Bahrman.Sarah@epa.gov>; Robinson, Valois <Robinson.Valois@epa.gov>; Chin, Lucita <Chin.Lucita@epa.gov>  
**Subject:** Update/Timing on DB Final Permit Effort

Could you please let me know asap if this is an accurate/reasonable characterization for Darcy on where we stand? Thanks, Douglas

*Hi Darcy: based on our DB Team call today, the following additional sections of the RTC are ready to review:*

*General Concerns – comments 188-199*

*Tribal consultation 200 - 211*

*Tribal treaty rights 212 – 229*

*General tribal concerns 230 - 235*

*EJ 236 – 262*

*NHPA 263*

*NEPA 264 (Everett is confirming this with Erin)*

*ESA – Following 264 (12 comments/responses)*

*Outside of scope comments (end of document, sections A to Z)*

*Once Lucita is done reviewing/revising the list of permit changes near the beginning of the RTC, this should also be available for our review this week.*

*The one significant set of responses still being finalized is for the CEA related comments. We expect to have the CEA done this week so our responses can be finalized.*

*The other outstanding major tasks that remain are:*

- *Drafting a letter to the NRC and other signatory agencies to the NHPA PA briefly describing our role in signing on. Mike and Valois expect to have this letter ready for your review this week before we send it to these agencies asking them to comment asap. The final letter will include EPA's formal signature page for the PA.*
- *Addressing all comments on the permits, AE ROD (currently being peer reviewed by Region 7's UIC regulatory expert), supporting documents (e.g., CEA), and the RTC.*
- *Completing the Administrative Record and Index with paralegal support including a large number of technical reference documents needed to defend our permit changes/responses to comments.*
- *A final comprehensive review of all documents (including the RTC) by ORC (Lucita) to ensure accurate cross referencing, consistency in language, etc. to reduce the likelihood of a remand of our permit/AE decisions.*
- *Follow up letters to all consulting tribes notifying them that: 1) EPA's consultation duties have concluded; 2) EPA is signing on to NRC's NHPA PA, and; 3) the attached RTC shows how their input was considered in our final decisions (note: we plan to meet with Paul and Kim this week to finalize this approach). We will also be sending a similar letter to the SD SHPO.*
- *Deployment of the Communications Strategy and Press Release in coordination with final permit/AE signature/issuance.*

*Based on the above, we project final permit issuance on Friday, November 13<sup>th</sup>.*

*Let us know if you would like to discuss further, etc.*

*Douglas*